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10 Attorneys for Defendant  
11 COSTCO WHOLESALE CORPORATION, a Washington  
12 Corporation

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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SOUTHERN DIVISION**

DANIEL RIVERA; MARIA RIVERA,

Plaintiff,

vs.

COSTCO WHOLESALE  
CORPORATION; and DOES 1 to 10,

Defendants.

CASE NO. 8:22-cv-01614

**DECLARATION OF LAUREN E.  
RAYA IN SUPPORT OF NOTICE OF  
REMOVAL OF ACTION TO  
FEDERAL COURT UNDER 28 U.S.C.  
§ 1441(a) (DIVERSITY)**

I, Lauren E. Raya, declare as follows:

1. I am an attorney, duly licensed to practice law in the State of California. I  
2 am an associate of the law firm of McNeil Tropp & Braun LLP, attorneys of record  
3 herein for Defendant, COSTCO WHOLESALE CORPORATION, a Washington  
4 Corporation. I have personal knowledge of the facts stated herein, and if called as a  
5 witness, could and would competently testify hereto.

2. True and correct copies of Plaintiffs, DANIEL RIVERA and MARIA  
3 RIVERA's Summons, Complaint, and Civil Case Cover Sheet are attached hereto as  
4 **Exhibit A.**

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3. At the time this action was commenced, and since that time, Plaintiffs were and are residents and citizens of the State of California, with their domicile in the State of California. I am informed of these facts based on responses to discovery.

4. A true and correct copy Plaintiffs' Proof of Service of Summons and Complaint is attached as **Exhibit B**.

5. A true and correct copy of Defendant's Answer, Declaration of Trial Attorney, and Jury Demand is attached as **Exhibit C**.

6. A true and correct copy of Plaintiffs' Statement of Damages is attached hereto as **Exhibit D**.

7. Attached hereto as **Exhibit E** is a true and correct copy of a printout from the California Secretary of State's website for Costco Wholesale Corporation. As depicted in **Exhibit E**, Costco Wholesale Corporation is incorporated in the State of Washington and its corporate headquarters and principal place of business is located in Washington.

8. Attached hereto as **Exhibit F** is a true and correct copy of the Notice to Adverse Parties of Removal of the Case to Federal Court, which will be filed with the Superior Court of California, County of Orange, and served on all involved parties to this action.

9. Plaintiffs filed an unlimited complaint seeking monetary damages in excess of \$25,000.00. In the complaint, Plaintiffs claim to have suffered (1) hospital and medical expenses; and (2) general damages as a result of the incident. Plaintiffs pray for compensatory damages according to proof.

I declare under penalty of perjury under the laws of the United States of America and California that the foregoing is true and correct.

Executed August 31, 2022, at Irvine, California.

/s/ Lauren E. Raya  
LAUREN E. RAYA

## CERTIFICATE OF SERVICE

I hereby certify on August 31, 2022, I electronically filed the foregoing:  
**DECLARATION OF LAUREN E. RAYA IN SUPPORT OF NOTICE OF  
REMOVAL OF ACTION TO FEDERAL COURT UNDER 28 U.S.C. § 1441(a)  
(DIVERSITY)** with the Clerk of the Court for the United States District Court, Central  
District of California by using the Central District CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the USDC-Central District of California CM/ECF system.

I further certify that participants in the case not registered to as CM/ECF users have been mailed a true and correct copy of the above described documents by First Class Mail, postage pre-paid, to the following non-CM/ECF participants:

Daniel Nelson, Esq.  
Nelson & Natale, LLP  
13144 Prairie Avenue  
Hawthorne, California 90250  
(310) 641-8300  
Fax: (310) 641-4932  
[Nelson.Natale@Yahoo.com](mailto:Nelson.Natale@Yahoo.com)

I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the United States Postal Service on that same day, with postage thereon fully prepaid at Irvine, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

**FEDERAL:**I declare under penalty of perjury in accordance with 28 U.S.C. Section 1746 that the foregoing is true and correct.

Executed on August 31, 2022, at Irvine, California.

/s/ Lauren E. Raya  
LAUREN E. RAYA